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November 21, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Written Ex Parte Presentation**
IB Docket No. 13-213

Dear Ms. Dortch:

On November 9, 2016, Globalstar, Inc. submitted a revised proposal asking the Commission to adopt rules that would permit it to use its 11.5 megahertz of licensed MSS spectrum in the 2483.5-2495 MHz band for terrestrial low-power service ("TLPS").¹ This Revised Proposal eliminated Globalstar's earlier request to combine its licensed spectrum with unlicensed spectrum in the 2473-2483.5 MHz ISM band.

Throughout this proceeding, WISPA has maintained an open mind about Globalstar's proposal, but has expressed concern that Globalstar did not address questions about the potential for harmful interference to the operations of fixed wireless Internet service providers that rely on Channel 11 to provide service to consumers.² In the Revised Proposal, Globalstar likewise acknowledged the filing of "a number of technical and policy objections."³

By narrowing its earlier proposal to confine TLPS to Globalstar's licensed spectrum at 2483.5-2495 MHz, WISPA's interference concerns have been addressed. WISPA believes that the Revised Proposal will adequately protect unlicensed operations in the 2473-2483.5 MHz ISM band. Accordingly, WISPA does not object to Commission approval of the Revised Proposal.

¹ See Letter from L. Barbee Ponder, Globalstar, Inc., to Marlene H. Dortch, FCC Secretary, IB Docket No. 13-213 (filed Nov. 9, 2016) ("Revised Proposal").

² See, e.g., Letter from Stephen E. Coran, WISPA counsel, to Marlene H. Dortch, FCC Secretary, IB Docket No. 13-213 (filed Dec. 10, 2015); WISPA Comments, IB Docket No. 13-213 (filed May 5, 2014); WISPA Reply Comments, IB Docket No. 13-213 (filed June 4, 2014); WISPA Comments, RM-11685 (filed Jan. 14, 2013).


³ Revised Proposal at 1.

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Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-captioned proceeding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stephen E. Coran", with a long horizontal flourish extending to the right.

Stephen E. Coran